

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

RUBEN QUIROZ-TREJO,)
Petitioner,)
v.)
DAVID RIVERA,)
Respondent.)

CASE NO.: 3:15-cv-1020

SENIOR JUDGE WILLIAM J. HAYNES, JR.

OPEN
Petition
14 day
for filing
requested
✓ filed
12/21/15

PETITIONER'S MOTION FOR EXTENSION OF TIME TO FILE REPLY/TRAVERSE

Pursuant to M.D. TENN. L.R. 7.01(b) and 28 U.S.C. §§ 2243 and 2248, Petitioner respectfully requests a ten (10)-day extension of time to file the Reply/Traverse to the Return filed by Respondent (ECF No. 9). This Court previously permitted leave to submit a Reply/Traverse on or before December 18, 2015. (ECF No. 11).

As good cause for this Motion, Petitioner, through counsel, states that additional time is needed as a result of several unanticipated, time-sensitive client emergencies that arose during the 14-day period Reply/Traverse counsel requested and that required immediate attention to prevent irreparable harm to clients. These included the imminent deportation of several detained clients or individuals on whose cases Plaintiff's counsel consults, as well as the arrest and need for emergency consultation with another of counsel's clients.

These unexpected, pressing demands, combined with the fact that Petitioner's counsel was able to work only limited hours for two days during the week of December 14–18 due to illness, have left Petitioner needing additional time to prepare and submit his filing.